

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
	}	MM Docket No. 99-25
Creation of a Low)	
Power Radio Source)	

COMMENTS OF WOWL,
FLORIDA ATLANTIC UNIVERSITY RADIO

Should the FCC rule to create Low Power FM Radio Stations, educational noncommercial entities must be considered first for the distribution of these new licenses. Due to increasingly congested airwaves, obtaining licenses for these valuable entities is close to impossible in large cities and urban areas. Educational entities are a valuable asset for thier communities, and they should not be without media capable of reaching it. However, since many educational entities are non-commercial, many are having difficulty obtaining valid licenses. Commercial enterprises have more resources and leveraging power then non-for-profit organizations, and it is therefore my belief that educational systems have been underrepresented in it's need for communication with the public. LPFM can help rectify this situation.

Educational entities provide the community with many benefits that commercial entities cannot, and the FCC should recognize this. The following consists of 5 arguments why non-commercial educational entities are more efficient and should be considered first and foremost:

1. College radio provides the community with an outlet for it's own expression. If a university obtains a license, it is not simply one single license with the ability to reach people mono-directionally. It is a license that is devoted to the population of the thousands of students and hundreds of faculty members in that university. The doors to WOWL are always open to the public. Therefore, many more people can have access and share their opinions with the communities through college radio. This is the first way in which an educational entity with a license is far more efficient then private, commercial licensing, and the first reason why education entities should be considered in distribution of new LPFM.

2. Radio Stations also provide important opportunities to help train students in their fields of interests. College radio provides students with opportunities to learn hands-on important business skills, marketing skills, promotional skills, engineering skills, political skills, communication skills, production skills, and all the other tasks required to operate fully functional radio stations. Therefore, by supporting educational entities first and

foremost, the FCC would also provide students many necessary skills for operating in today's economic environment, and that in turn, will benefit society in the long run.

3. Since College Radio ultimately represents its students and faculty members, it is designed to be as eclectic and culturally responsive to ALL groups within that university. Hence, college radio serves its community by default in the most efficient manner possible.

4. College radio provides programming that would not ordinarily be aired on commercial stations, such as lectures, local sporting events, local musical events, and therefore provides the community with an opportunity to listen in to rare/valuable broadcasting moments.

5. College Radio provides an important link between faculty and the students. It can provide students with information pertaining to the university such as classes, faculty news, and school-closings. LPFM would be a great benefit to universities with large commuter based students who are unable to receive the restricted local carrier wave transmissions on campus. 90% of FAU's student population is commuter based, and this is an important argument for allowing educational entities the right of FM representation.

In reference to question 19 and 69 in proposal MM Docket No. 99-25, LPFM should remain strictly for noncommercial broadcasting purposes. All low power (and microradio) services should be limited to noncommercial operation, and eligibility should correspondingly be restricted to those who would qualify as noncommercial licensees under current FCC rules. This would help ensure that LPFM does not become what FM is today, and that the community would retain a voice.